



SAN LUIS OBISPO COUNTY FARM BUREAU

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June 4, 2015

Commissioners
San Luis Obispo County Planning Commission
976 Osos St.
Rm. 200
San Luis Obispo, CA 93401

Re: Countywide Water Conservation Program

Dear Commissioners:

The San Luis Obispo County Farm Bureau (SLOCFB) once again appreciates this opportunity to comment on the Offset Ordinance amendments.

Emphasize Parcel Lines on Basin Map:

Attachment D, Figure XX-Paso Robles Ground Water Basin Page 2 and 3: The figures/maps on these 2 pages actually have barely visible parcel lines. If these lines could be in much bolder ink it would help not only the landowner but also the County to see what land or portions of a landowner's property is actually within the basin under discussion.

New Crop versus Replacing the Same Crop:

Attachment D, Pages 3 and 4, with Table 1. Also Page 10 of 10 Definitions:

It is critical to agriculture that there be a footnote to pages 3-4 and Table 1 and an added definition that clearly states that, *“replacing a crop with the same crop will not be covered by this ordinance”*. As stated by Commissioner Campbell on the 29th, new varieties and technology can even make more dense planting water saving. There needs to be more discussion acknowledging that replaced planting with denser planting does not automatically mean additional water consumption.

Replace “Some Form of Crop Production” With Ag Production:

Attachment D, Page 5 or 10, G, 2:

Replace the current statement “will remain in some form of crop production” with *“will continue in agricultural production”*. This is important as we continue in the 4th year of drought with the possibility of more drought years to come. At the time of the Agricultural Offset Clearance Review and Approval is completed, there may be sufficient water to make the site eligible as a sending site. In the future if the drought continues this may not be the case and the landowner will still be able to continue in agriculture

Mission Statement:

“To lead San Luis Obispo County in the protection, promotion and advocacy of agriculture for the benefit of our members and community.”

with grazing. This would be far better than trying to force crop production which may not even be possible.

Short-term Offsets:

Attachment D, page 4 of 10, E. Eligible Sites for Participation:

As stated at the May 29th hearing, SLOCFB would like to urge the Planning Commission to support a short-term offset program of 1 to 4 years which would be fitting with certain types of crops such as annual vegetable or seed crops. This is separate from the currently proposed program that is proposed to last until SGMA is adopted and possibly beyond.

By adding a subset of number 2, a 1 to 4 year offset could be included which would could state that *“Short-term Offset means new, expanded or intensification of irrigated crop production on any site which obtains all or a portion of its planting credits for a period not to exceed years from a sending site. Obtaining water would be in the form of reducing or eliminating water use from the sending site for a period not to exceed 4 years from the sending site. A short-term sending site could be contiguous or have the same owner as the site of the new irrigated crop production.”* The number of years could be 1 to 3 or 4 if this would be more feasible. The main point is that this would an offset that would not be in place for the number of years that ordinance will likely be in effect.

1:1 Ratio Offset:

Project Description of the Draft EIR, Section 2.0, Pages 2-3:

I hope that the Project Description stating that the, “proposed Agricultural Offset Program is...intended to substantially reduce groundwater extraction and lowering of the groundwater levels and that “all new or more intensively irrigated agriculture offset new water use at a minimum 1:1 ratio” will be correctly restated that the *Agricultural Offset Program is intended to protect further reduction of the groundwater levels through a 1:1 offset ratio.*

There may be other places in the proposed amendments where the above changes may apply and I hope that the changes can be included in all appropriate locations in the amendments before you.

I appreciate your giving serious consideration to the comments on May 29th and hope that the statements in this letter will be of more help in the deliberations relating to the offset ordinance.

Thank you,



Legislative Analyst

PRO Water Equity, Inc.

Paso Robles Groundwater Basin Overliers for Water Equity

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May 30, 2015

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Chairman Ken Topping
Commissioner Jim Irving
Commissioner Eric Meyer
Commissioner Jim Harrison
Commissioner Don Campbell

Re: Request for comments on Countywide Water Conservation Program

Dear Commissioners,

Per Commissioner Irving's request after my public comments at Friday's Planning Commission Study Session on the Countywide Water Conservation Program, the following are the substantive points that were made:

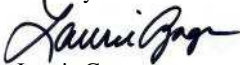
I am Laurie Gage, rural resident and Vice President of PRO Water Equity, one of the two groups whose compromise formed the basis for AB2453. We would like to ask you to address the question of a minimum acreage exemption to the Ag Offset Program. Small family agriculture certainly needs protection, but 20 acres may be too large for exemption purposes. 20 acres, especially in multiples, could cumulatively have a great impact. We would request that you consider a 5-acre and under exemption as that does allow for farm-to-table type of agriculture to exist. We further ask that whatever the exemption level you move forward, you consider making any plantings under the exemption not capable of being used for offset down the line.

We further would encourage you to consider some sort of proximity analysis for discontinuous offset occurring within the areas of severe decline in connection with a discretionary permit process.

Additionally, we are concerned that any planting that may occur due to the window that now exists between the expiration of the current Urgency Ordinance and what will replace it, not be used for future offset or any basis for vested rights. Please make that part of your recommendation to the Board of Supervisors.

We would like to acknowledge the hard work of the agricultural community in their acceptance of the need for the ordinance, and their hard work and compromise on the various parts of the program.

Thank you.



Laurie Gage
Vice President

cc: Xzandrea Fowler, SLO County Planning Department

Mission Statement: To promote the health, safety, common good and general welfare of the community by advocating for the stabilization and sustainability of the Paso Robles groundwater basin for the benefit of all overlayers.